



Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

MAY CHIANG

may.chiang@dechert.com
+1 212 649 8734 Direct

June 21, 2024

VIA ECF

Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jane Street Group LLC v. Millennium Management LLC*, 24 C 2783 (PAE),
LETTER MOTION TO SEAL AMENDED COUNTERCLAIMS

Dear Judge Engelmayer:

We represent Defendant Millennium Management LLC (“Millennium”) in the above-referenced action. We write to request permission to seal certain materials that potentially contain the parties’ proprietary, commercially sensitive, or trade secret information. Millennium files its Amended Counterclaims (along with its previously-filed Answer and Affirmative Defenses) in accordance with the Court’s June 3, 2024 Order (D.I. 95) and seeks to seal its filing consistent with the Court’s prior Orders granting sealing of Millennium’s Answer and Counterclaims (D.I. 75, D.I. 110) and also pursuant to the parties’ agreement described below.

The parties have agreed that if any party is filing any document that might possibly reveal or reflect information that the non-filing party may seek to redact (including information that is protected under the Confidentiality Order), the filing party will initially file the document completely under seal. The parties will then confer within two business days on whether any part of the filing should remain under seal, if the filing can be made publicly, or if any redactions are requested. The original filing party agrees to honor all such proposed redactions in the public redacted filing, without prejudice to the right to dispute any proposed redactions in accordance with the Court’s procedures.

Millennium therefore respectfully requests permission to file its Amended Counterclaims under seal.

Respectfully submitted,

GRANTED. SO ORDERED.

/s/ May Chiang

May Chiang


PAUL A. ENGELMAYER
United States District Judge

Dated: June 24, 2024

New York, New York

cc: Deborah Brown, Quinn Emanuel, by ECF
Rollo Baker, Elsberg Baker & Maruri, by ECF